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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

NML CAPITAL, LTD.,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

CASE NO.: 2:14-cv-00492-JAD-VCF

**NML CAPITAL, LTD.'S NOTICE OF  
COMPLIANCE WITH COURT'S MARCH  
16, 2015, ORDER TO FILE A SCHEDULE  
FOR THE PRODUCTION OF  
DOCUMENTS**

Plaintiff NML Capital, Ltd. ("NML"), by and through its attorneys of record, Brownstein Hyatt Farber Schreck, LLP and Dechert LLP, hereby submits its notice in compliance with the Court's March 16, 2015, Order (Dkt. #101) (the "Order"). Pursuant to the Court's Order, the parties were required to "meet and confer to set a schedule for producing documents in compliance" with the Order. (*See* Dkt. #101.) The Court further ordered that the "schedule must be filed with the court by April 20, 2015. (*See id.*) As of the filing of this notice, the parties have been unable to agree upon any schedule. Therefore, NML submits its own response and proposed schedule.

1 NML has reviewed Non-Party MF Corporate Services (Nevada) Limited's ("MF Nevada")  
 2 Status Report and Proposed Discovery Schedule (Dkt. #118). MF Nevada's characterizations of  
 3 the interactions and discussions between counsel for MF Nevada, counsel for NML, and counsel  
 4 for proposed intervenor Mossack Fonseca & Co. ("Mossack Fonseca") are simply untrue. NML's  
 5 counsel has not "delayed issuing a decision or a proposal for a schedule". Nor has NML's counsel  
 6 "failed to return calls or inquiries". Nevertheless, NML believes that a point-by-point refutation  
 7 of MF Nevada's allegations would be unproductive and, more importantly, unresponsive to the  
 8 Court's Order.<sup>1</sup>

9 NML has engaged, and will continue to engage, in discussions with counsel for Mossack  
 10 Fonseca and counsel for MF Nevada to determine whether the parties can find common ground.  
 11 In the meantime, NML submits, in compliance with the Court's Order, the following proposed  
 12 document production schedule for Mossack Fonseca and MF Nevada:

- 13 a) April 20, 2015 – Mossack Fonseca to begin a rolling production of documents that
- 14 do not implicate privilege and/or confidentiality issues (30 days to complete
- 15 rolling production);
- 16 b) May 20, 2015 – Deadline to meet and confer with respect to privilege and
- 17 confidentiality issues, and to identify any areas of dispute to the Court for the
- 18 Court's resolution;
- 19 c) May 20, 2015 – Mossack Fonseca to begin making a rolling production of
- 20 documents that it contends do implicate privilege and/or confidentiality issues, but
- 21 as to which the parties are able to agree on the mechanics of production (30 days
- 22 to complete rolling production); and

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25 <sup>1</sup> NML is cautiously optimistic that, within the next few days, it will be able to reach an agreement  
 26 with MF Nevada and Mossack Fonseca regarding Mossack Fonseca's production of documents pursuant to  
 27 the Court's Order and regarding MF Nevada's request for a stay (Dkt. #117). If the parties reach an  
 28 impasse, NML will expound on the history of NML's counsel's discussions with counsel for MF Nevada  
 and counsel for Mossack Fonseca in its Response to MF Nevada's motion to stay (Dkt. #117), which will  
 be filed in due course.

d) Immediately following the Court's resolution of any mechanical issues the parties are unable to resolve consensually – Mossack Fonseca to begin making a rolling production of documents in compliance with the Court's ruling on the mechanical issues (30 days to complete rolling production).

NML also made a proposal to VDL concerning VDL's obligation to produce documents pursuant to the Court's Order. As of the filing of this notice, VDL's counsel is awaiting a response from his client to the proposal. NML will continue to explore these discussions with VDL. Nevertheless, in compliance with the Court's Order, NML proposes that the Court enter the following document production schedule for VDL:

- a) April 27, 2015 – VDL to begin making a rolling production of documents in compliance with the Order; and
- b) May 11, 2015 – Deadline for VDL's complete production.

DATED this 20th day of April 2015.

BROWNSTEIN HYATT FARBER  
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**CERTIFICATE OF SERVICE**

Pursuant to Fed.R.Civ.P.5(b), I certify that I am an employee of BROWNSTEIN HYATT FARBER SCHRECK, LLP, and that the foregoing **NML CAPITAL, LTD.'S NOTICE OF COMPLIANCE WITH COURT'S MARCH 16, 2015, ORDER TO FILE A SCHEDULE FOR THE PRODUCTION OF DOCUMENTS** was served via electronic service to all electronic registered CM/ECF users in this matter, and via U.S. Mail, postage prepaid, on the date and to the address shown below:

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DATED this 20<sup>th</sup> day of April, 2015.

/s/ Paula Kay  
an employee of Brownstein Hyatt Farber Schreck, LLP

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